From: <u>Jason Gumbs</u>

 To:
 andrew.s.barren@gm.com

 Cc:
 Gregory Orehowsky; Khesha Reed

Subject: Re: Request decision on HD label modification and canister loading waiver

Date: 08/03/2009 04:03 PM

Attachments: 2011 HD Diesel Emission Label, Request to elim fuel rate at hp 090723.pptx

Andrew,

Absent a regulatory provision that allows a label requirement to be omitted, Ford needs to comply with the label requirement.

Jason Gumbs (gumbs.jason@epa.gov) Environmental Engineer

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▼ andrew.s.barren---07/23/2009 08:34:21 AM---Jason, On June 8, 2009, we had an opportunity to review General Motors (GM)

From: andrew.s.barren@gm.com

To: Jason Gumbs/DC/USEPA/US@EPA

Cc: Gregory Orehowsky/DC/USEPA/US@EPA, Khesha Reed/DC/USEPA/US@EPA

Date: 07/23/2009 08:34 AM

Subject: Request decision on HD label modification and canister loading waiver

Jason,

On June 8, 2009, we had an opportunity to review General Motors (GM) certification plans for model year (MY) 2011 heavy duty (HD) engine products. At that time we asked EPA to consider a modification to MY11 and later diesel emission labels. The request was to remove the "rated fuel @ horsepower" information from diesel emission labels for the fact that information is obsolete for modern diesel applications. I'm including the slide we reviewed at the meeting on this topic.

Any opportunity we have to eliminate wasted work results in a better value for our customers, and a more accurate and compliant product. If you need further detail, please contact me. Any feedback is appreciated on status of this request.

Thank you,

Andy Barren General Motors



2011 HD Diesel Emission Label, Request to elim fuel rate at hp 090723.pptx